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**SQUIRE
SANDERS**LEGAL
COUNSEL
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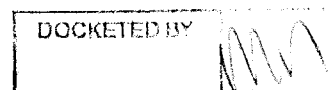
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ARIZONA CORPORATION COMMISSION
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Sept. 17, 2008

BY FEDEX (602-542-3477)Arizona Corporation Commission
DOCKETED

APR 14 2008

Pamela J. Genung, Staff Analyst
Arizona Corporation Commission
Docket Control
1200 W. Washington Street
Phoenix, AZ 85007-2927**Re: Reliance Communications International, Inc. Responses to Staff's First Set of Data Requests; Docket No. T-20611A-08-0405**

Dear Ms. Genung:

On behalf of my client, Reliance Communications International, Inc. ("RCII"), please find below RCII's responses to the Staff's First Set of Data Requests dated August 19, 2008. RCII filed an Application for a Certificate of Convenience and Necessity to provide resold long distance telecommunications services within the State of Arizona on August 11, 2008. Also, please date-stamp the extra copy of the response and return it to me in the enclosed, self-addressed and stamped envelope.

PJG 1-1: Please clarify RCII's response to item A-13 of its Application.

RCII does not provide long distance access via 1+101XXXX. RCII provides pre-paid and post-paid calling services accessed by PIN or customer telephone number recognition. Services are purchased by customer credit card on RCII's website (www.relianceindiacall.com).

PJG 1-2: As requested in item A-16 of the Application, please submit copies of affidavits of publication indicating that RCII has published legal notice in all the counties where the authority to provide service is requested.

The affidavits of publication will be sent under a separate cover.

PJG 1-3: Is RCII currently providing intrastate long distance telecommunications services in other states? If so, please list the states.

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RCII does not yet provide intrastate long distance telecommunications services in other states. RCII, however, is authorized to operate in Arkansas, California, Colorado, Florida, Illinois, Indiana, Montana, New York, and Texas, and authorizations are pending in Arizona, Maryland, Massachusetts, Nebraska, New Mexico, Pennsylvania, Wisconsin and West Virginia. No requests for authorization have been denied, nor any authorization revoked from RCII.

PJG 1-4: On Original Page 13 of RCII's proposed Arizona Tariff No. 1, at 2.5.4 Advance Payments, RCII has stated that prepayment of services does not constitute advance payment. Please provide an explanation as to how RCII arrived at that conclusion.

Advance payments are different than prepayment of service in that prepayment of service allows the company to decrement against that prepayment as service is being used. Advance payments are based on estimated use for 1-2 months and are applied against the initial bill. Prepayment of service is required on an ongoing basis.

The company makes the statement in the tariff in order to clarify. The company does not require a deposit or advance payment – but does require prepayment of its debit card (prepaid) services in order for a customer to use the service.

PJG 1-5: On Original Page 20 of RICC's proposed Arizona Tariff No. 1, at 3.6 Public Telephone surcharge, the per call charge is listed at \$0.69. The Commission's current policy allows a maximum per call rate of \$0.60. Therefore, it is recommended that a replacement page to the proposed tariff be filed containing the lesser maximum rate.

See attached.

PJG 1-6: Please indicate if RCII plans to offer service in the residential and/or business markets.

RCII provides a pre-paid and post-paid calling service purchased on its website by customer credit card. It can be used with a customer's home phone, business phone, mobile phone or payphone. Customers are provided an access number and PIN or the customer's telephone number is recognized to access the services. RCII will not be the presubscribed local or long distance carrier for any customer.

PJG 1-7: Please specify the rates that RCII or an affiliate will charge for similar services in the other states/jurisdictions in which RCII has been approved to provide service. Is there a difference between the rates that your Company will charge in Arizona and the rates that your Company will charge in the other states/jurisdictions for similar service, please identify and indicate the amount of the difference and explain why you are charging different rates in Arizona.

RCII has filed the exact same rates in all states.

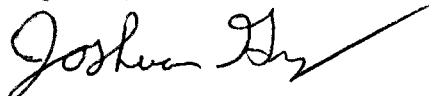
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Feel free to contact me if you have any further questions.

Sincerely,

SQUIRE, SANDERS & DEMPSEY L.L.P.

A handwritten signature in black ink, appearing to read "Joshua T. Guyan", with a long, sweeping horizontal stroke extending to the right.

Joshua T. Guyan

Enclosures

SECTION 3 - DESCRIPTION OF SERVICES AND RATES, (CONT'D.)**3.6 Public Telephone Surcharge**

In order to recover the Company's expenses to comply with the FCC's pay telephone compensation plan effective on October 7, 1997 (FCC 97-371), an undiscountable per call charge is applicable to all interstate, intrastate and international calls that originate from any domestic pay telephone used to access the Company's services. This surcharge, which is in addition to standard tariffed usage charges and any applicable service charges and surcharges associated with the Company's service, applies for the use of the instrument used to access the Company service and is unrelated to the Company's service accessed from the pay telephone.

Pay telephones include coin-operated and coinless phones owned by local telephone companies, independent companies and other interexchange carriers. The Public Pay Telephone Surcharge applies to the initial completed call and any reoriginated call (i.e., using the "#" symbol).

The Public Pay Telephone Surcharge does not apply to calls placed from pay telephones at which the Customer pays for service by inserting coins during the progress of the call.

Per Call Charge:

\$0.60

Issued:

Effective:

Issued By:

Siddharth Kothari, Finance Manager
570 Lexington Avenue, 38th Floor
New York, NY 10022

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SECTION 6 - CURRENT PRICE LIST

6.1 Public Telephone Surcharge

Per Call Charge: \$0.60

6.2 Nationwide Prepaid LD

Per Minute Rate: \$0.059

6.3 Nationwide PINless Prepaid LD

Per Minute Rate: \$0.059

6.4 Travel Card Service

Per Minute Rate: \$0.059

Per Call Charge: \$0.000

Issued:

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